

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America)
v.)
Juan Antonio Cepeda, and) Case No.
Abraham Joaquin Canela)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 14, 2020 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18 United States Code, Section 554	Did knowingly export or send from the U.S., or attempt to export or send from the U.S., approximately 23,000 rounds of 7.62x39 and .223 caliber ammunition, 14 firearms, and 15 magazines contrary to any law or regulation of the U.S., or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the U.S.

This criminal complaint is based on these facts:

Please see attachment

Continued on the attached sheet.

/s/ Matthew Rosselot

Complainant's signature

Matthew Rosselot, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/16/2020

Judge's signature

City and state: Laredo, Texas

Christopher A. dos Santos, US Magistrate Judge

Printed name and title

ATTACHMENT A

I am a Special Agent (SA) of the United States with Homeland Security Investigations (HSI) and am knowledgeable of the following facts:

1. On September 14, 2020, HSI received information from the Laredo Police Department (LPD) regarding a possible weapons shipment bound for Mexico from Houston, Texas. HSI, LPD, and Texas Department of Public Safety (DPS) conducted a joint surveillance operation on IH-35 in Laredo, TX and observed two vehicles, a tan Chevrolet Tahoe and a tan Lincoln Navigator traveling in tandem.
2. DPS troopers conducted a traffic stop on the Lincoln Navigator for a traffic violation and identified the driver as Abraham CANELA. CANELA stated he was traveling from Houston, TX to Nuevo Laredo, Mexico to purchase hammocks and candy. CANELA stated he was not traveling with anyone. During a consent search of CANELA's vehicle, troopers discovered a ledger with notations about ammunition.
3. LPD officers conducted a traffic stop on the Chevrolet Tahoe for a traffic violation and identified the driver as Juan Antonio CEPEDA. During a consent search of CEPEDA's vehicle, officers discovered approximately 23,000 rounds of 7.62x39 and .223 caliber ammunition, fourteen firearms, and fifteen magazines.
4. During a post-Miranda interview, CEPEDA stated an unknown subject in Mexico told him to travel to Houston, TX, to pick up ammunition. CEPEDA stated on September 13, 2020 he traveled to Houston and stayed in a hotel. CEPEDA stated on September 14, 2020, unknown subjects picked up his vehicle from the hotel, loaded the vehicle with ammunition, and returned the vehicle to the hotel. CEPEDA stated he drove the vehicle to Laredo, TX where he was stopped by law enforcement. CEPEDA stated he believed he was transporting ammunition but was unaware of the weapons. CEPEDA stated he believed he was being followed by someone but was unsure by whom. CEPEDA stated he was going to be paid \$2000.00, for driving the ammunition to Laredo, Texas. CEPEDA stated he was aware the ammunition was bound for Mexico and that it was illegal for him to engage in such activity.
5. CEPEDA stated he previously transported a load of ammunition for the same subjects last week and was paid \$2000.00 for doing so. CEPEDA stated when he transported the first load, the unknown subject in Mexico, told CEPEDA he would receive a call from a subject in Houston, Texas. CEPEDA stated once in Houston, he received a call from a subject saved in his phone as "Abra" asking CEPEDA where he was. CEPEDA told "Abra" he was in Houston, Texas, and said he then received a call from the subject in Mexico, telling him to be ready to turn over his vehicle to be loaded with the ammunition. CEPEDA stated he then received a call from "Abra" telling CEPEDA to take off immediately once he got his vehicle back. CEPEDA stated when he arrived in Laredo, Texas, he turned over his vehicle to unknown subjects to be unloaded. CEPEDA stated he subsequently met with an unknown subject near the San Agustin Plaza who paid him \$2000.00. CEPEDA stated this payment was coordinated by the unknown subject in Mexico. CEPEDA stated on September 14, 2020, he received multiple calls from "Abra" checking on his location and asking for updates while he was transporting the

ammunition. CEPEDA stated he never met “Abran” in person and only communicated with him on the phone. During a consent search of CEPEDA’s phone, agents observed recent calls with “Abran” and further noted the contact number saved as “Abran” was later learned to be CANELA’s cell phone number. CEPEDA stated he does not have, nor has he applied for, a license to lawfully export weapons or ammunition.

6. During a post-Miranda interview, CANELA stated he traveled from Houston, TX and was en route to Nuevo Laredo, Mexico to buy candy and hammocks. CANELA stated he intended on staying in a hotel but had not made reservations yet. CANELA stated he was traveling alone and was not following anyone to Laredo, Texas. CANELA admitted to purchasing and selling weapons and ammunition but said he never did so for persons in Laredo, Texas or Mexico.

7. Ammunition and firearms are listed on the Commerce Control List (CCL) and illegal to export without a license and/or declaration.